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*Attorneys for Defendant J.P. Gallagher*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BUTTE DIVISION

THE IMPERIAL SOVEREIGN COURT  
OF THE STATE OF MONTANA; ADRIA  
JAWORT; RACHEL CORCORAN;  
MONTANA BOOK COMPANY;  
IMAGINE BREWING COMPANY, LLC  
d/b/a IMAGINE NATION BREWING  
COMPANY; BUMBLEBEE AERIAL  
FITNESS; MONTANA PRIDE; THE  
WESTERN MONTANA COMMUNITY  
CENTER; THE GREAT FALLS LGBTQ+  
CENTER; THE ROXY THEATER; and  
THE MYRNA LOY,

Plaintiffs,

v.

AUSTIN KNUDSEN; ELSIE ARNTZEN;  
and J.P. GALLAGHER; and THE CITY  
OF HELENA,

Defendants.

CV 23-50-BU-BMM


**DECLARATION OF  
EILEEN JOYCE**

I, Eileen Joyce, declare and state as follows:

1. I have personal knowledge of the facts set forth in this declaration and am over the age of 18 and otherwise competent to testify.
2. I make this declaration in support of Defendant J.P. Gallagher's response to Plaintiffs' motion for preliminary injunction.
3. I am the elected County Attorney for the City and County of Butte-Silver Bow (BSB) and have served in that capacity since 2009. As County Attorney, I am BSB's chief legal officer and am responsible for providing legal advice and guidance to the Chief Executive and all BSB departments.
4. On June 8, 2023, I received a litigation hold letter from Constance Van Kley, one of the attorneys representing Plaintiff Adria Jawort in this action. A true and correct copy of the letter is attached as **Exhibit A**.

I declare under penalty of perjury under the laws of the State of Montana that the foregoing is true and correct.

DATED this 4th day of August, 2023.

  
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Eileen Joyce